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INTERVENTION

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Arizona Corporation Commission
BEFORE THE ARIZONA CORPORATION COMMISSION
DOCKETED

2002 JUN 14 P 4:02

WILLIAMS A. MUNDELL

Chairman

JUN 14 2002

JIM IRVIN

Commissioner

AZ CORP COMMISSION
DOCUMENT CONTROL

MARC SPITZER

Commissioner

DOCKETED BY

CAR

IN THE MATTER OF THE GENERIC
 PROCEEDINGS CONCERNING ELECTRIC
 RESTRUCTURING ISSUES.

Docket No. E-00000A-02-0051

IN THE MATTER OF ARIZONA PUBLIC
 SERVICE COMPANY'S REQUEST FOR
 VARIANCE OF CERTAIN
 REQUIREMENTS OF A.A.C. R14-2-1606.

Docket No. E-01345A-01-0822

IN THE MATTER OF THE GENERIC
 PROCEEDING CONCERNING THE
 ARIZONA INDEPENDENT SCHEDULING
 ADMINISTRATOR.

Docket No. E-00000A-01-0630

IN THE MATTER OF TUCSON ELECTRIC
 POWER COMPANY'S APPLICATION FOR
 A VARIANCE OF CERTAIN ELECTRIC
 COMPETITION RULES COMPLIANCE
 DATES.

Docket No. E-01933A-02-0069

IN THE MATTER OF THE APPLICATION
 OF TUCSON ELECTRIC POWER
 COMPANY FOR APPROVAL OF ITS
 STRANDED COST RECOVERY.

Docket No. E-01933A-98-0471

MOTION TO INTERVENE

AES New Energy, Inc. ("AES NE"), pursuant to A.A.C. R14-3-105,
 hereby moves to intervene in the above-captioned proceeding. In support hereof, AES
 NE states as follows:

1. AES NE holds a certificate of convenience and necessity to
 provide competitive services as an electric services provider. AES NE is a wholly-
 owned subsidiary of the AES Corporation, a leading global power company comprised
 of competitive generation, distribution and retail businesses around the world.

JONES, SKELTON & HOCHULL, P.L.C.

ATTORNEYS AT LAW

2901 NORTH CENTRAL AVENUE

SUITE 800

PHOENIX, ARIZONA 85012

TELEPHONE (602) 263-1700

1 2. AES NE seeks to participate in these proceedings because the
2 issues being resolved here will affect whether electric competition is viable in Arizona.
3 These proceedings therefore directly affect AES NE's financial interest in providing
4 competitive electric services.

5 3. AES NE's participation in this proceeding will not unduly
6 broaden the nature or scope of this proceeding.

7 4. No other party or intervenor can represent the interests of AES
8 NE.

9 5. Service of all correspondence, documents or pleadings should
10 be made to counsel for AES NE as follows:

11 Daniel W. Douglass
12 Law Offices of Daniel W. Douglass
13 5959 Topanga Canyon Blvd., Suite 244
14 Woodland Hills, CA 91367-7313

15 and

16 Randall H. Warner
17 Jones Skelton & Hochuli, PLC
18 2901 N. Central Avenue, Suite 800
19 Phoenix, Arizona 85012

20 6. AES NE only determined that intervention was necessary when
21 it reviewed the testimony of Tucson Electric Power Company's witnesses. Because it
22 believes the position advocated by TEP's witnesses would be detrimental to
23 competition, it has file rebuttal testimony and requests leave to intervene.

24 WHEREFORE, for the foregoing reasons, AES NE respectfully requests
25 that the Commission issue its order granting this Motion to Intervene.
26

JONES, SKELTON & HOCHULI, P.L.C.

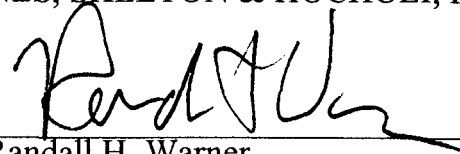
ATTORNEYS AT LAW
2901 NORTH CENTRAL AVENUE
SUITE 800
PHOENIX, ARIZONA 85012
TELEPHONE (602) 263-1700

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RESPECTFULLY SUBMITTED this 14th day of June, 2002.

JONES, SKELTON & HOCHULI, P.L.C.

By


Randall H. Warner
2901 North Central Avenue, Suite 800
Phoenix, Arizona 85012

and

Daniel W. Douglass
Law Offices of Daniel W. Douglass
5959 Topanga Canyon Blvd., Suite 244
Woodland Hills, CA 91367-7313

Attorneys for AES New Energy, Inc.

JONES, SKELTON & HOCHULL, P.L.C.

TORNEYS AT LAW
2901 NORTH CENTRAL AVENUE
SUITE 800
PHOENIX, ARIZONA 85012
TELEPHONE (602) 263-1700

- 1 ORIGINAL and 10 COPIES filed
- 2 this 14th day of June, 2002, with:
- 3 Docket Control
- 4 Arizona Corporation Commission
- 5 1200 W. Washington Street
- 6 Phoenix, AZ 85007
- 7 COPY of the foregoing delivered
- 8 this 14th day of June, 2002, to:
- 9 Lyn Farmer
- 10 Chief Administrative Law Judge
- 11 Arizona Corporation Commission
- 12 1200 W. Washington Street
- 13 Phoenix, AZ 85007
- 14 Christopher Kempley
- 15 Chief Counsel
- 16 Arizona Corporation Commission
- 17 1200 W. Washington Street
- 18 Phoenix, AZ 85007
- 19 Ernest G. Johnson
- 20 Utilities Division
- 21 Arizona Corporation Commission
- 22 1200 W. Washington Street
- 23 Phoenix, AZ 85007
- 24 COPY of the foregoing mailed
- 25 this 14th day of June, 2002, to:
- 26 All parties in ACC Docket
- No. E-0000A-02-0051

M. Hauer